



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUN 15 2015

CERTIFIED MAIL 7009 1680 0000 7662 5838
RETURN RECEIPT REQUESTED

Mr. Gary Selby
Hazardous Waste Program Manager
Wright-Patterson Air Force Base
88 CEG/CEI
1450 Littrell Road
Building 22, Area A
Wright-Patterson AFB, Ohio 45433

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Wright-Patterson AFB
EPA I.D. No.: OH7 571 724 312

Dear Mr. Selby:

On May 14, 2014, representatives of the U.S. Environmental Protection Agency and the Ohio Environmental Protection Agency inspected the Wright-Patterson Air Force Base (WPAFB) facility located in Wright-Patterson AFB, Ohio. As a large quantity generator of hazardous waste, WPAFB is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate WPAFB's compliance with its Ohio Hazardous Waste Facility Installation and Operation Permit and certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by WPAFB, EPA's review of records pertaining to WPAFB, and the inspector's observations, EPA has determined that WPAFB was not in compliance with the following permits conditions at the time of inspection:

1. Personnel Training

Permit Condition B.6 [OAC 3745-54-16 (A) – (D)] requires WPAFB to have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed). Also, Permit Condition B.6 requires WPAFB to ensure facility personnel successfully completes this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, take part in an annual review of this initial training, and keep training records for current personnel until closure of the facility and for former employees for at least three years from the date of last employment.

The review of WPAFB's training records did not indicate completion of RCRA related training for Teresa Finke and David Blair for the past three years.

2. Contingency Plan- Emergency Procedures

Permit Condition B.18 (b) [OAC 3745-54-53] requires WPAFB to submit a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan. Additionally, Permit Condition B.18 (b) [OAC 3745-54-53] requires WPAFB to notify all parties identified in the contingency plan in writing of amendments, modifications, or revisions to the plan within 10 days of the effective date of the change in the plan.

Permit Condition B.17 [OAC 3745-54-54] requires WPAFB to review the approved contingency plan at least annually and amend the plan immediately if needed.

Review of WPAFB's contingency plan records did not indicate: (1) the plan was reviewed annually; (2) a copy of the plan was submitted to each of the local and/or installation emergency providers; and (3) a written notification of amendments, modifications, or revisions was provided to all identified parties in the plan.

At the time of the inspection, WPAFB was not compliance with the following large quantity generator permit exemption conditions:

3. Contingency Plan

In order to avoid the need for a hazardous waste storage permit, a large quantity generator must have a contingency plan that describes the actions facility personnel must take to comply with rules 3745-65-51 and 3745-65-56 of the Administrative Code in response to fires explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. *See* Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-52(A)[40 C.F.R. §§ 262.34(a)(4) and 265.52(a)].

The plan must: (1) describe all arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio and local emergency response teams to

coordinate emergency services, pursuant to rule 3745-65-37 of the Administrative Code. *See* Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-52(C)[40 C.F.R. §§ 262.34(a)(4) and 265.52(c)]; (2) provide a current list of all names, addresses and telephone numbers (office and home) of all persons qualified to act as an emergency coordinator. *See* Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-52(D)[40 C.F.R. §§ 262.34(a)(4) and 265.52(d)]; (3) provide a current list of all equipment, including: location, a physical description and brief outline of capabilities. *See* Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-52(E)[40 C.F.R. §§ 262.34(a)(4) and 265.52(e)]; and (4) provide an evacuation plan for facility personnel where there is a possibility that evacuation may be possible. *See* Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-52(F)[40 C.F.R. §§ 262.34(a)(4) and 265.52(f)];

The contingency plan that was provided for review does not incorporate contingency procedures (responses to fires, spills, explosions, and evacuation), equipment information, and evacuation plans for facility personnel located in the following buildings of WPAFB Area B: (1) Building # 475; Building # 477; Building # 485; and Building # 20652.

4. Preparedness and Prevention

In order to avoid the need for a hazardous waste storage permit, a large quantity generator must ensure that a copy of the contingency plan and all revisions to the plan be submitted to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams that may be requested to provide emergency services. *See* Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-53(A) (B)[40 C.F.R. §§ 262.34(a)(4) and 265.53 (a) (b)].

Review of WPAFB's contingency plan documents did not indicate the written notification and submittal of the plan to local and/or installation emergency providers.

Other areas of noncompliance at WPAFB include:

5. Universal Waste Accumulation Time

Under Ohio Admin. Code §§ 3745-273-35(A) [40 C.F.R. § 273.35(a)], a large quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of paragraph (B) of this rule are met.

In order to meet the requirements of paragraph (B), the activity must be solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. The handler bears the burden of proving that such activity was solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. *See* Ohio Admin. Code §§ 3745-273-35(B) [40 C.F.R. § 273.35(b)].

Under Ohio Admin. Code §§ 3745-273-35(C) [40 C.F.R. § 273.35(c)], a large quantity handler of universal waste shall be able to demonstrate the length of time that the universal

waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:

- (1) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;
- (2) Marking or labeling the individual item of universal waste (i.e., each battery or thermostat) with the date it became a waste or was received;
- (3) Maintaining an inventory system on-site that identifies the date the universal waste being accumulated became a waste or was received;
- (4) Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received;
- (5) Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received; or
- (6) Providing any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

At the time of the inspection at WPAFB, the inspector could not determine if each of the universal waste lamp containers were labeled with the earliest date of that the universal waste was received; nor was any other method provided to the inspector to demonstrate the length of time the universal waste had been accumulating from the date it became a waste.

6. Universal Waste Shipment Tracking Standards

Under Ohio Admin. Code §§ 3745-273-39(A) [40 C.F.R. § 273.39(a)], a large quantity handler of universal waste shall keep a record of each shipment of universal waste received at the facility. The record may take the form of a log, invoice, manifest, bill of lading, or other shipping document. The record for each shipment of universal waste received shall include the following information:

- (1) The name and address of the originating universal waste handler or foreign shipper from whom the universal waste was sent;
- (2) The quantity of each type of universal waste received (e.g., batteries, pesticides, thermostats);
- (3) The date of receipt of the shipment of universal waste.

Under Ohio Admin. Code §§ 3745-273-39(B) [40 C.F.R. § 273.39(b)], a large quantity handler of universal waste shall keep a record of each shipment of universal waste sent from the handler to other facilities. The record may take the form of a log, invoice, manifest, bill of lading, or other shipping document. The record for each shipment of universal waste sent shall include the following information:

- (1) The name and address of the universal waste handler, destination facility, or foreign destination to whom the universal waste was sent;
- (2) The quantity of each type of universal waste sent (e.g., batteries, pesticides, thermostats);
- (3) The date the shipment of universal waste left the facility.

Under Ohio Admin. Code §§ 3745-273-39(C) [40 C.F.R. § 273.39(c)], a large quantity handler of universal waste shall retain the records described in paragraph (A) of this rule for at least three years from the date of receipt of a shipment of universal waste. A large quantity handler of universal waste shall retain the records described in paragraph (B) of this rule for at least three years from the date a shipment of universal waste left the facility.

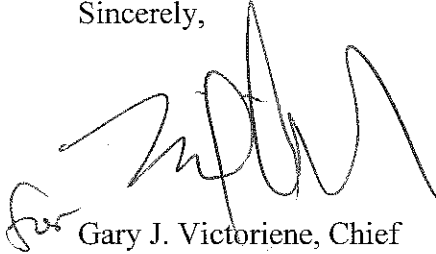
At the time of the inspection, WPAFB did not provide universal waste shipment documentation for 2011, 2012, 2013 and 2014. However, on May 19, 2014, WPAFB forwarded four email messages to EPA to document shipment of universal waste lamps to other facilities for calendar years 2010, 2011, 2012, and 2013. Shipment of universal waste in 2014 was not provided.

On failing to comply with the condition for a permit exemption referenced in item 3 through 4 above, WPAFB was required to file a permit modification, revision, or revocation to Ohio Permit# 05-29-0475. WPAFB's failure to file a permit modification, revision, or revocation to Ohio Permit# 05-29-0475 violated Permit Condition A.2.

At this time EPA is not requiring WPAFB to file a permit modification, revision, or revocation so long as it immediately establishes compliance with the conditions for exemption as outlined above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified period. Although this is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Cindy Dabner, United States Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Cindy Dabner, of my staff, at dabner.cindy@epa.gov or 312-886-5890.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Victoriene", written over a horizontal line.

Gary J. Victoriene, Chief
RCRA Branch

Enclosures

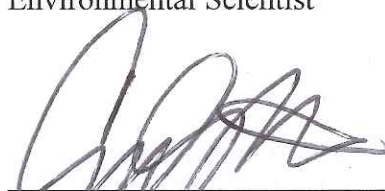
cc: Teri Finfrock, Ohio EPA (teri.finfrock@epa.gov)

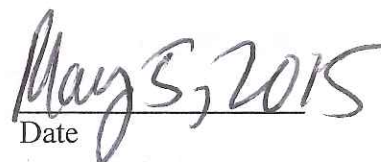
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR8J
77 WEST JACKSON BLVD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Wright-Patterson Air Force Base (WPAFB)
EPA ID NUMBER: OH7 751 724 312
ADDRESS: 2750 ABW-EM Wright Patterson AFB, Ohio 45433-5332
DATE OF INSPECTION: May 14, 2014
EPA INSPECTOR: Cindy Dabner
Environmental Scientist


PREPARED BY:


Cindy Dabner
Compliance Section 2


Date

APPROVED BY:


Julie Morris, Chief,
Compliance Section 2


Date

Purpose of the Inspection

This inspection was an evaluation of Wright-Patterson Air Force Base (WPAFB)'s compliance with hazardous waste regulations found in the Ohio Administrative Code (OAC) and in Title 40 of the Code of Federal Regulations (40 CFR), Parts 260 through 279. Inspector Cindy Dabner of the U.S. Environmental Protection Agency Region 5 conducted the inspection. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation (CEI). The site notified as a large quantity generator (LQG).

Participants

U.S. Environmental Protection Agency-

Cindy Dabner, U.S. EPA Inspector U.S. EPA Region 5

dabner.cindy@epa.gov

Work Phone: 312-886-5890

Representative of WPAFB

Gary Selby, Hazardous Waste Program Manager

gary.selby@us.af.mil

Phone: 937-257-3349

Introduction

On May 14, 2014, Inspector Dabner arrived to the site at approximately 10:30 am. Inspector Cindy Dabner presented her federal identification and explained the purpose of the visit was to conduct a hazardous waste inspection.

During the opening conference, Inspector Dabner inquired about the required safety measures to conduct during the inspection tour. According to the facility representative, the typical standard safety equipment was all that was required. The standard safety equipment included steel toed shoes and hard hat. No special safety measures were mentioned or identified to Inspector Dabner.

Inspector Dabner discussed during the opening conference, confidential business information (CBI) and the use of a camera during the inspection. The WPAFB representative did not make any CBI claims on: (1) the information provided to the inspector; or (2) photographs taken during the inspection.

Site Description

WPAFB is an active military facility located in southwestern Ohio east of the city of Dayton. The military base occupies 8,551 acres and is composed of two airfields, Wright Field and Patterson Field. The two airfields are separated by State Route 444 and the Consolidated Rail Corporation Tracks. Wright Field is located in Area B which is situated in Montgomery and Greene counties. Patterson Field falls in Area A. Area A is located in Greene County except for 1.5 miles adjacent to the Mad River which is in Montgomery County. Clark County borders the northeast military property line.

WPAFB is the largest and most diverse organizations in the Air Force. The military installation can be compared to a large industrial park or a medium size community. More than 125

organizations representing a broad spectrum of Air Force Department of Defense (DoD) activities are located at the WPAFB. The WPAFB is also one of the largest employers in the state of Ohio at a single location as well as the largest employers among the U.S. Air Force bases worldwide. Civilian employees comprise more than half of the work force at WPAFB. Wright Field of Area B encompasses approximately 2,840 acres and includes three runways, the Aeronautical Systems Center, the U.S. Air Force (USAF) Research Laboratory, the USAF Museum, and the USAF Institute of Technology. Patterson Field is located in Area A and C.

WPAFB RCRA Permit

WPAFB, Area B, EPA Identification# OH7571724312, holds a Hazardous Waste Storage Permit (Permit# 05-29-0475). Permit#05-29-475 was issued by the Ohio Environmental Protection Agency (OEPA) on June 27, 2011. The Permit was made effective on June 27, 2011 and expires on June 27, 2021.

A Class 1 Modification to the Part B Permit Application was submitted to the Ohio EPA on December 18, 2014.

Additional WPAFB EPA Identification Numbers

WPAFB holds a second EPA Identification Number for Area A. The EPA Identification Number for Area A is OH70090066. According to the facility representative, a less than 90 day storage area is located at Area A.

Waste Generation

WPAFB Area B is considered to be a large quantity generator (LQG) of hazardous waste. The typical hazardous waste streams are generated from research, maintenance, and restoration activities throughout the military installation. The largest waste stream on the installation is derived from the Air Force Research Laboratory complex. The areas in each building of the Air Force Research Laboratory complex are called initial accumulation points (IAP). Each IAP has a code to assist in identifying and tracking hazardous waste on the military installation.

Site Tour

The focus of the inspection centered on EPA Identification# OH7571724312, WPAFB, Area B, specifically Building 479, Building 477, Building 485, Building 475, and Building 20652.

The site inspection began at Building 279. Building 279 serves as the permitted hazardous waste storage area for WPAFB, Area B. Once inside Building 279, the inspector observed the following areas:

- The Ignitable S01 Storage Area
 - Hazardous waste containers were observed closed and marked appropriately. No concerns were noted.
- The Corrosive S01 Storage Area
 - Hazardous waste containers were observed closed and marked appropriately with adequate aisle space. No concerns were noted.

The inspection continued to Building 477. This building served as a location to consolidate hazardous waste. No storage of hazardous waste was observed at this location at the time of the inspection.

The inspection then moved to Building 475. At this location, the inspector observed the storage and accumulation of universal waste. Based on the amount of universal waste observed stored in Building 475, WPAFB Area B appears to be a large quantity universal waste handler of over 5,000 kilograms (11, 023 pounds) of hazardous waste. The universal waste containers appeared to be closed, structurally sound. No evidence of leaks, spillages, or damages were observed at the time of the inspection. However, it was very difficult for the inspector to determine if each of the containers of universal waste were marked properly. The accumulation start date was not accessible for each of the containers. Adequate aisle space was not provided in the Universal Waste Storage Room in Building 475.

The next area inspected was Building 485. Building 485 appeared to function as a container storage room. No hazardous waste was observed stored in this area.

Following the inspection of Building 485, the inspection proceeded to Building 20652, Room 145. At this location IAP#B093 was observed. Containers were observed closed and marked as hazardous waste.

The inspection moved to Room 223 of Building 20652. At this location IAP#B0244 was observed. Containers were observed closed and marked as hazardous waste.

Finally, emergency equipment was observed throughout the rooms covered by the site tour, where hazardous waste was managed. The quantity of hazardous waste was observed within permit conditions. Adequate aisle space was observed at the locations where hazardous waste was managed.

Record Review

A records review was conducted during and after the inspection. The inspector requested to review hazardous waste determination documents, hazardous waste manifest, land disposal restriction (LDR) forms, universal waste documents, contingency plans, daily tank inspection records, weekly inspection logs, biennial reports, and personnel training records for the past three years.

The following items were observed as the result of the record review:

Generator Status Notification:

The facility reported as large quantity generator (LQG) and is a permittee (Ohio Permit# 05-29-0475).

Manifest Requirements:

Manifest records were reviewed for calendar years 2012, 2013, and 2014. No concerns were noted in regard to hazardous waste manifest documents made available for review.

Waste Analysis/Waste Analysis Plan:

No concerns were noted in regard to hazardous waste determination documents that were reviewed.

Land Disposal Restriction Requirements:

Land disposal restriction documents were provided at the time of the inspection. No concerns were noted in regard to land disposal restriction documents that were available for review.

Storage of Hazardous Waste in Containers/Container Inspections:

No concerns were noted in regard to documenting inspection of containers in the permitted storage area and IAPs.

Personnel Training Records:

Hazardous waste management training records (2011, 2012, 2013, and 2014) to include contingency plan implementation training were not provided for the following personnel:

- Teresa Finke
- David Blair

Contingency Plan and Emergency Procedures:

A number of buildings within WPAFB Area B stores hazardous waste. The WPAFB Contingency Plan provided does not incorporate contingency procedures for personnel who manage hazardous waste at buildings #s Building 477, Building 485, Building 475, and Building 20652.

Documentation that copies of the contingency plan had been provided to each of the emergency authorities were not provided at the time of the inspection. Contingency plan documentation did not indicate annual review of contingency plan. Written notification of amendments, modifications, or revisions was provided to all identified parties in the plan.

Preparedness and Prevention:

Letters of notification to local and/or installation emergency providers were not provided for review at the time of the inspection.

Annual Reporting Requirement:

No concerns were noted in regard to annual reporting.

Universal Waste Accumulation and Tracking:

Universal waste shipments receipt documentation for the past 3 years were not made available for review at the time of inspection. Additionally, WPAFB was unable to demonstrate the length of time the universal waste had been accumulating.

Closing Conference

A closing conference was conducted with Mr. Selby. The Inspector summarized the notes taken during the inspection. Inspector Dabner explained how the observation notes would be reviewed

and used to generate an inspection report. Inspector Dabner briefly discussed EPA's procedures for following up with the facility representative after conducting an inspection.

Post-Inspection

Prior to completion of this inspection report, Mr. Selby provided Inspector Dabner supplemental information. Supplemental information is provided in Attachment D-WPAFB Supporting Documentation Log.

Attachments

- A. WPAFB Photographs
- B. WPAFB Checklist
- C. WPAFB Supporting Documentation Log
- D. WPAFB Supporting Documentation Log Post Inspection

ATTACHMENT A

WPAFB Inspection Photographs

OH7 751 724 312

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #1
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 14, 2014
Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312
Description: Area B Building 479 –Location at the permitted Hazardous Waste storage facility entrance

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #2

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Area B Building 479 –Location at the permitted Hazardous Waste storage facility entrance

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #3

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 -Ignitable S01 Storage Area

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #4

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 -Ignitable S01 Storage Area

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #5

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 -Ignitable S01 Storage Area

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #6

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 –Ignitable S01 Storage Area

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #7

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 -Ignitable S01 Storage Area

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #8

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 -Ignitable S01 Storage Area

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #9

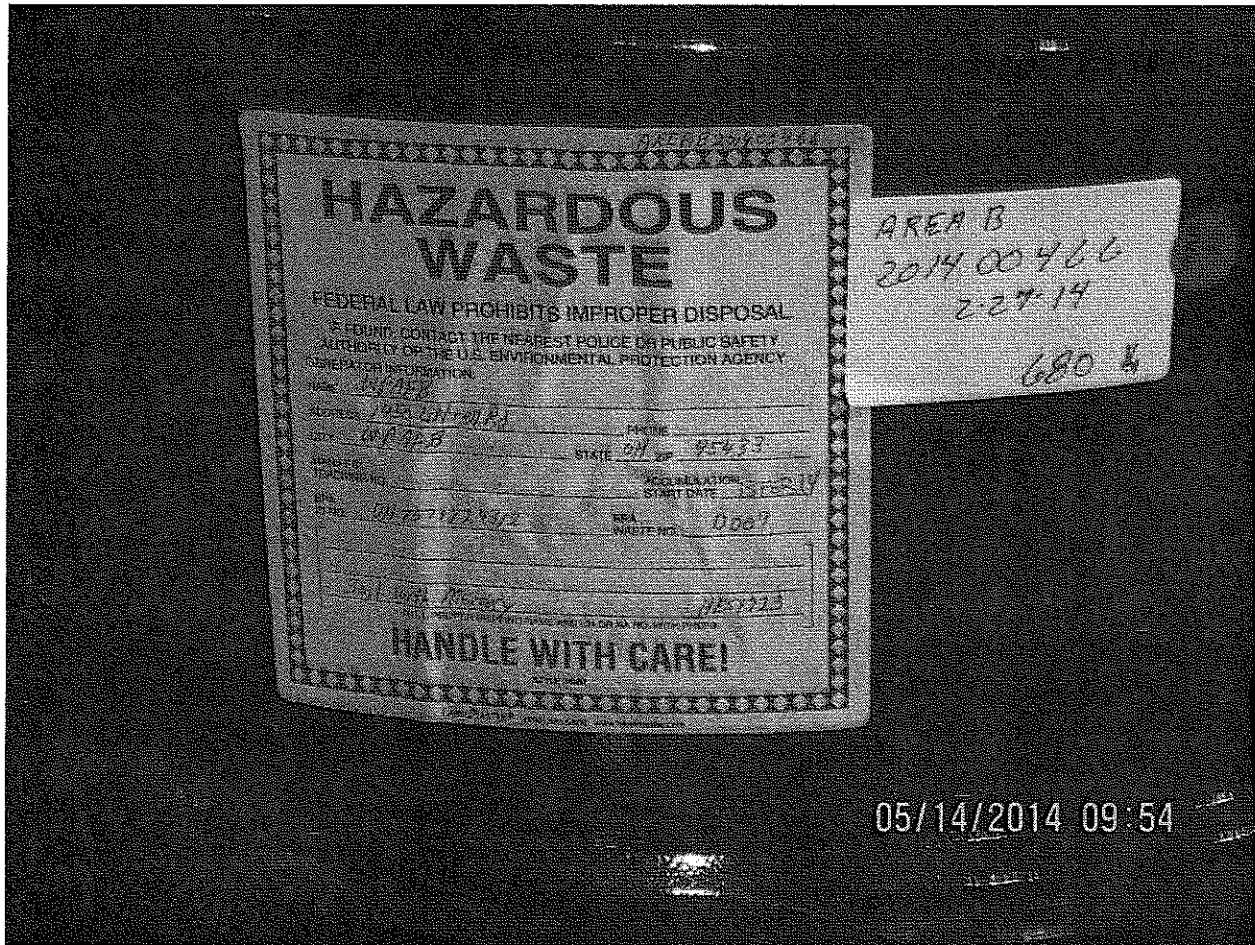
Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 –Ignitable S01 Storage Area

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #10
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 14, 2014
Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312
Description: Building 479 -Permitted Storage Area HW Label for soil with Mercury

May 14, 2014

05/14/2014 09:56

Description: Building 479 –Permitted Storage Area Soil from Building #20019 EPA Waste Code

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #12

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Bldg.479 -Permitted Storage Area Dangerous When Wet S01 Storage

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #13

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 Emergency Spill Equipment Eye Wash

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #14

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 Emergency Equipment

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #15

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

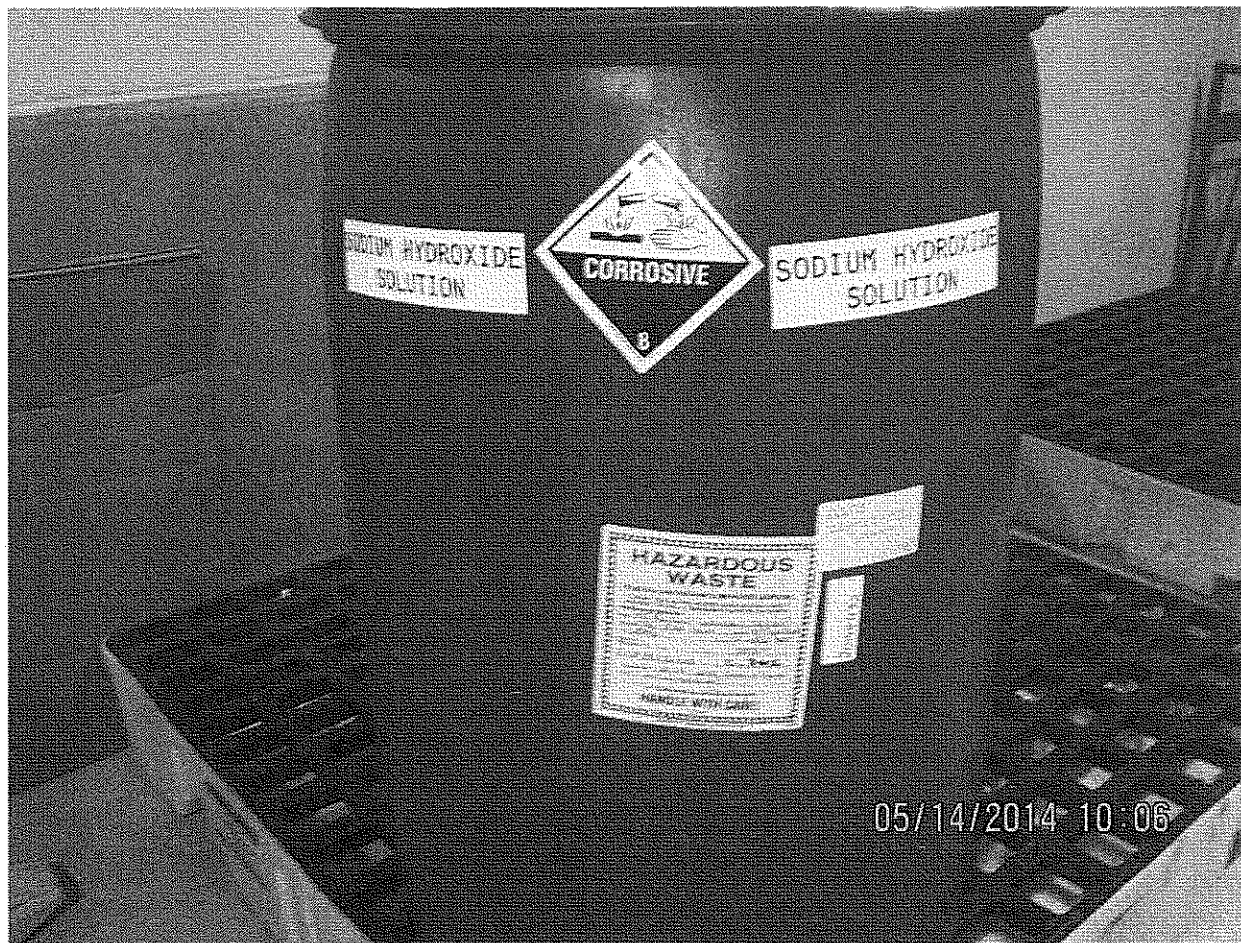
Description: Building 479 –Corrosive S01 Storage Sign

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #16
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 14, 2014
Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312
Description: Building 479 -Alkaline Drum S01 storage

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #17

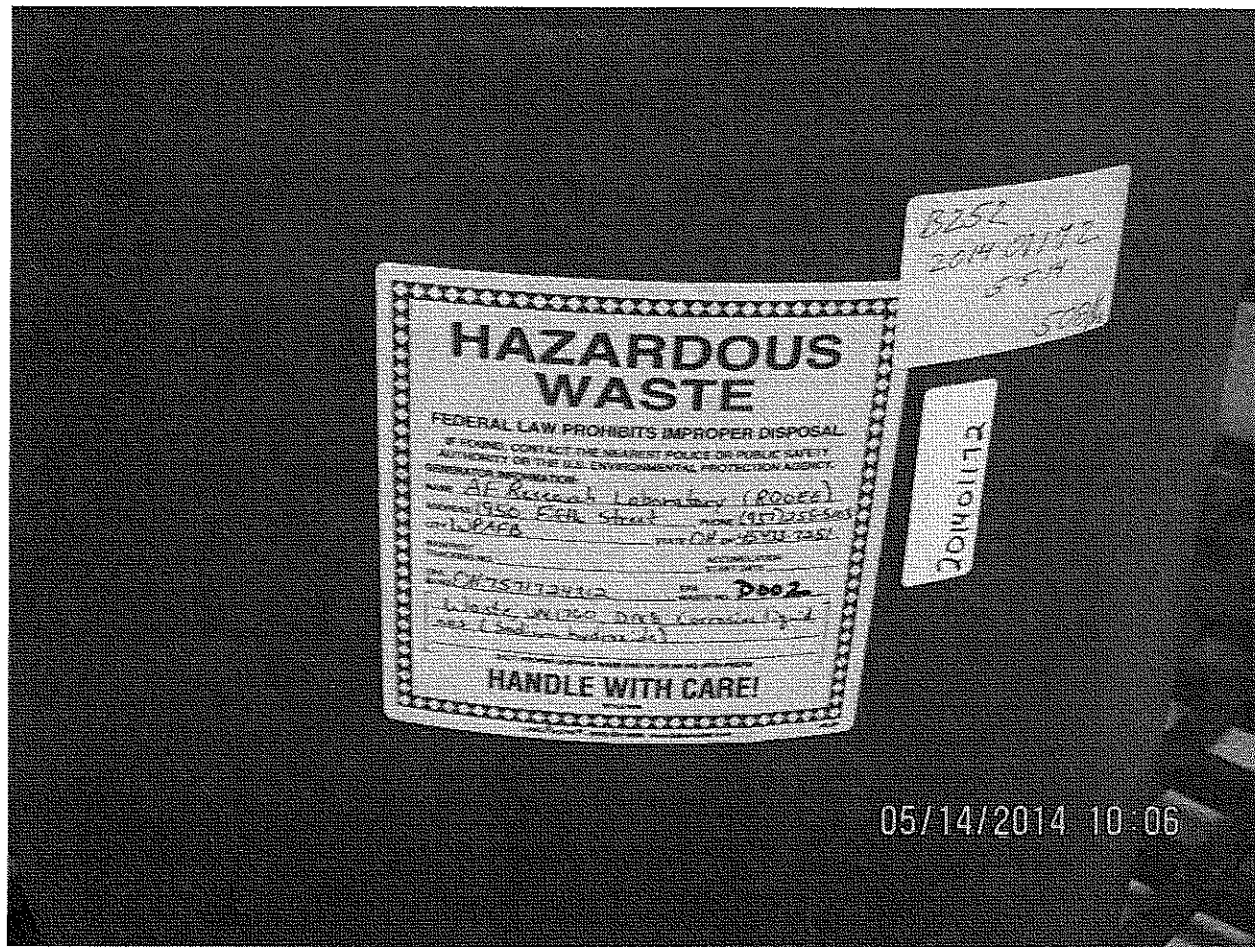
Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

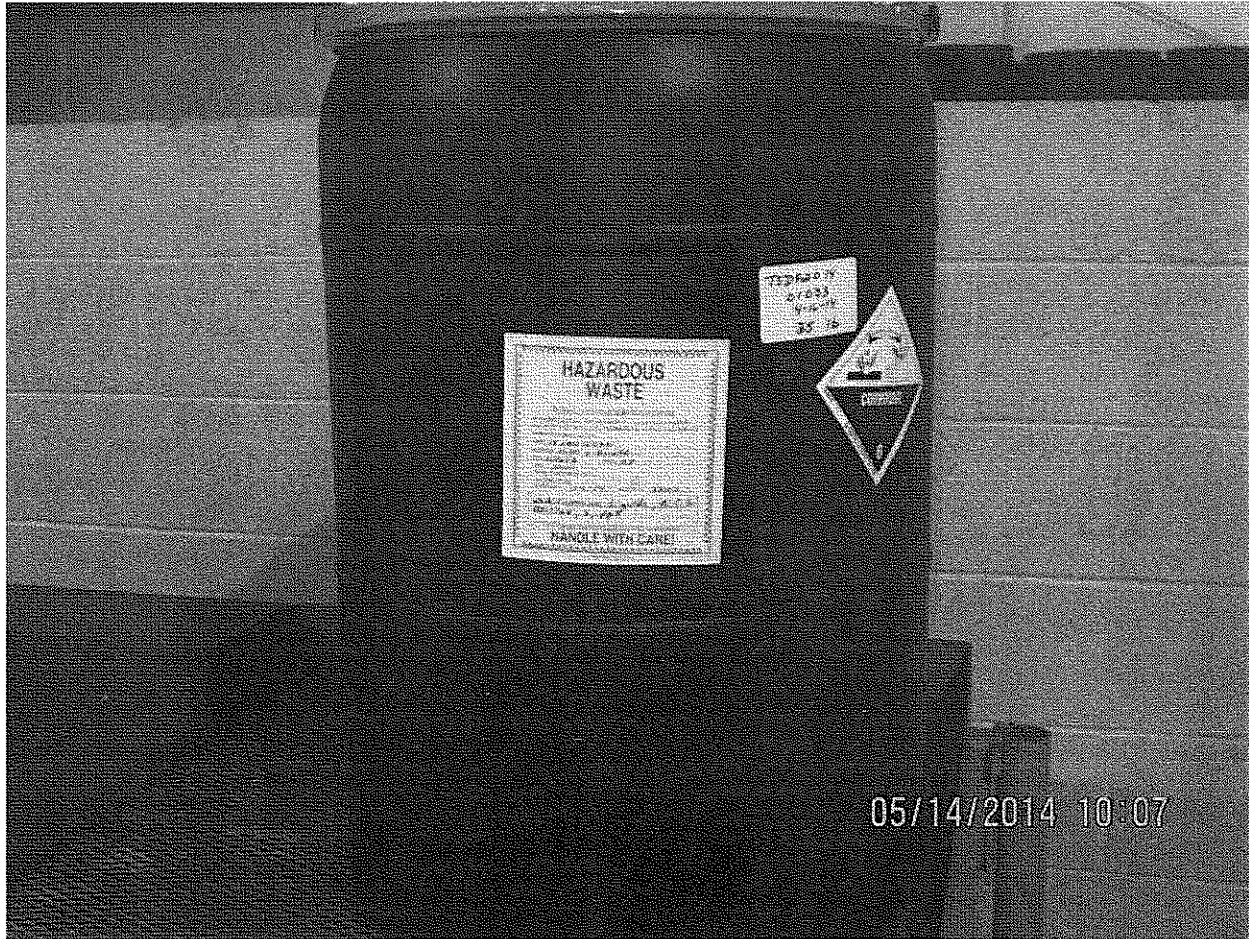
Description: Building 479 -Alkaline Drum Sodium Hydroxide

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #18
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 14, 2014
Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312
Description: Building 479 -Alkaline Drum S01 Storage

Attachment A
Photographs for Wright Patterson AFB RCRA CEI
OH7 571 724 312
2750 ABW-EM
May 14, 2014



Photograph: #19

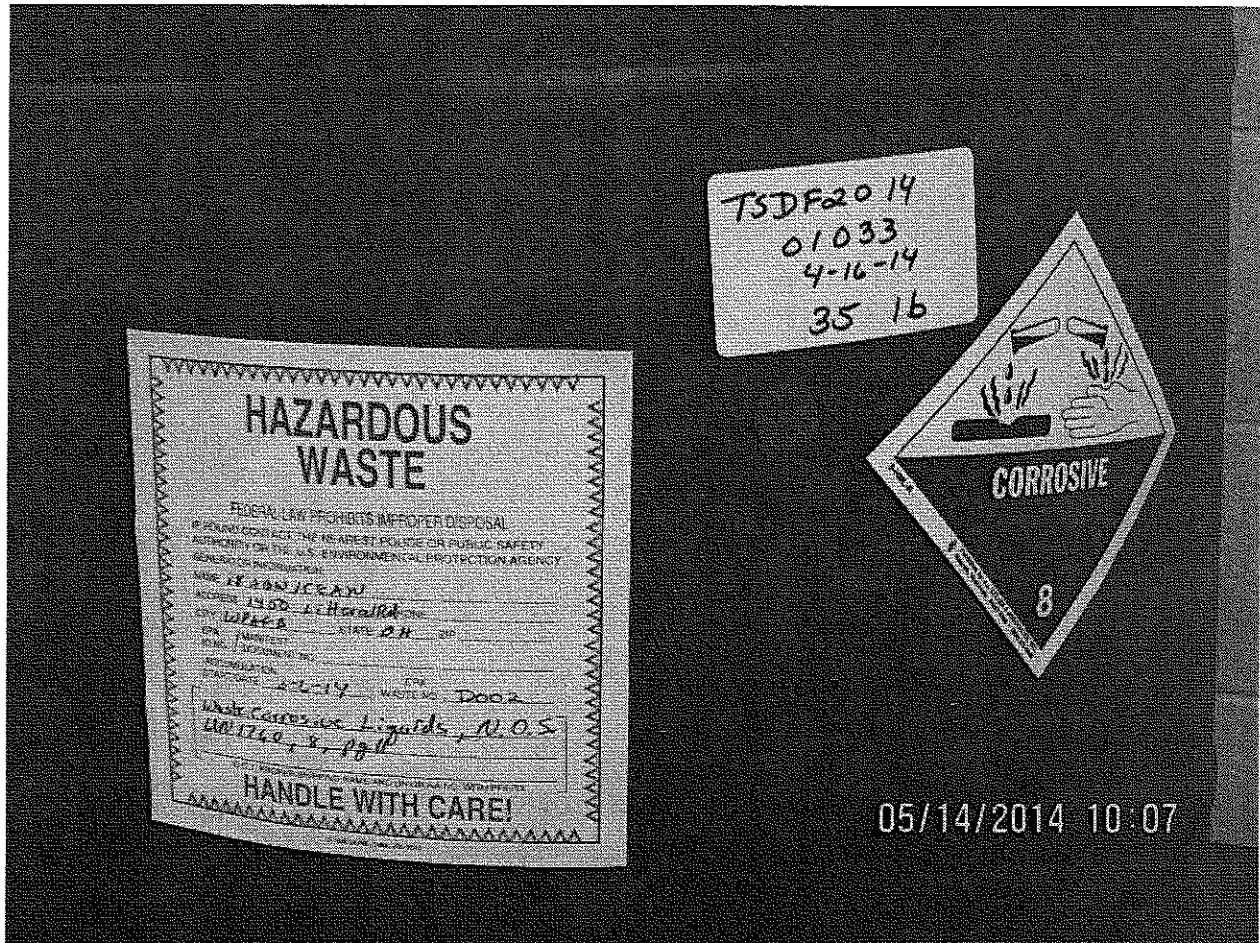
Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 -Corrosive S01 Storage

Attachment A
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Photograph: #20

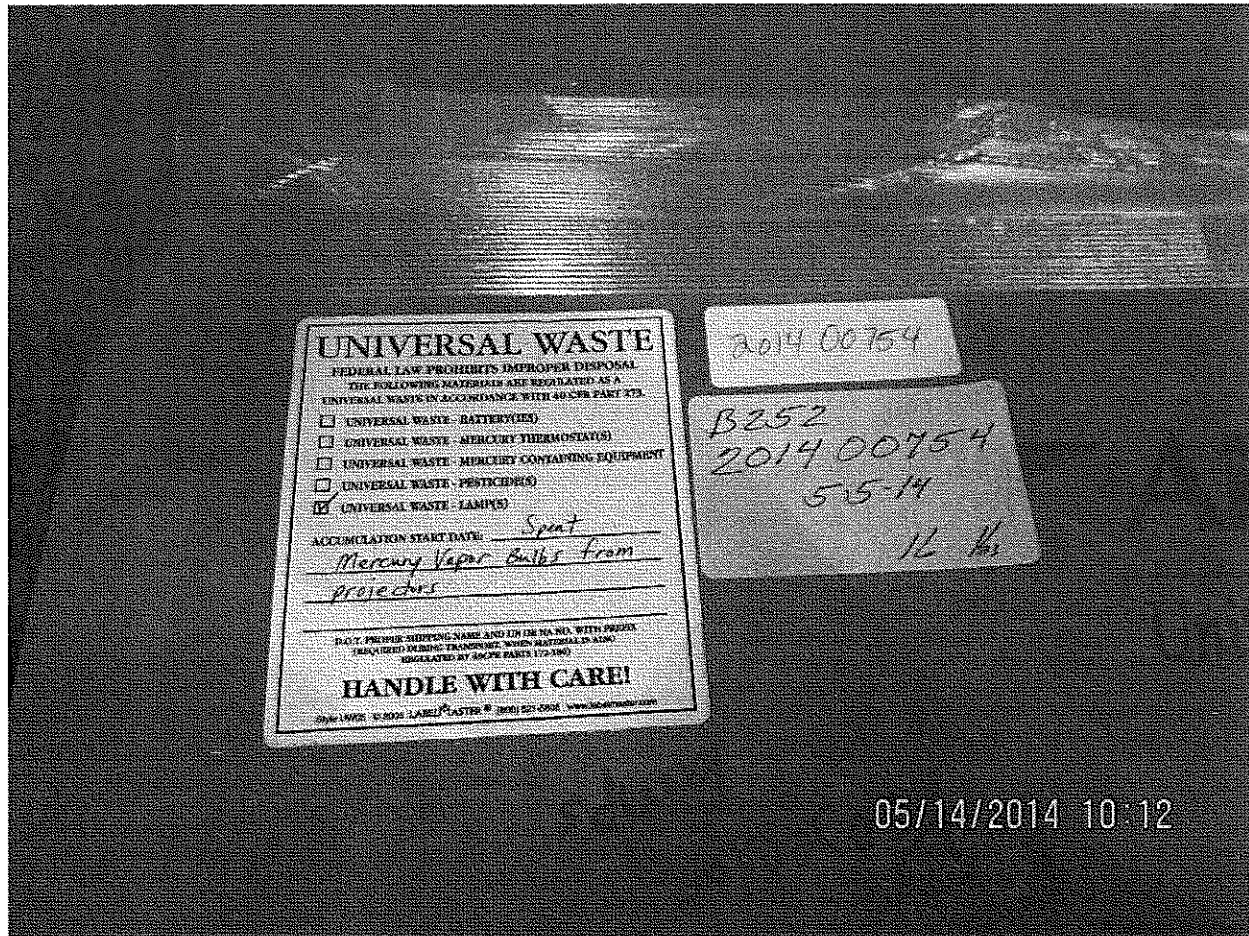
Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 -Corrosive S01 Storage

Attachment A
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Photograph: #21

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 -Universal Waste Storage

Attachment A
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Photograph: #22

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 -Corrosive S01 Storage

Attachment A
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Photograph: #23

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 –Corrosive S01 Storage

Attachment A
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Photograph: #24

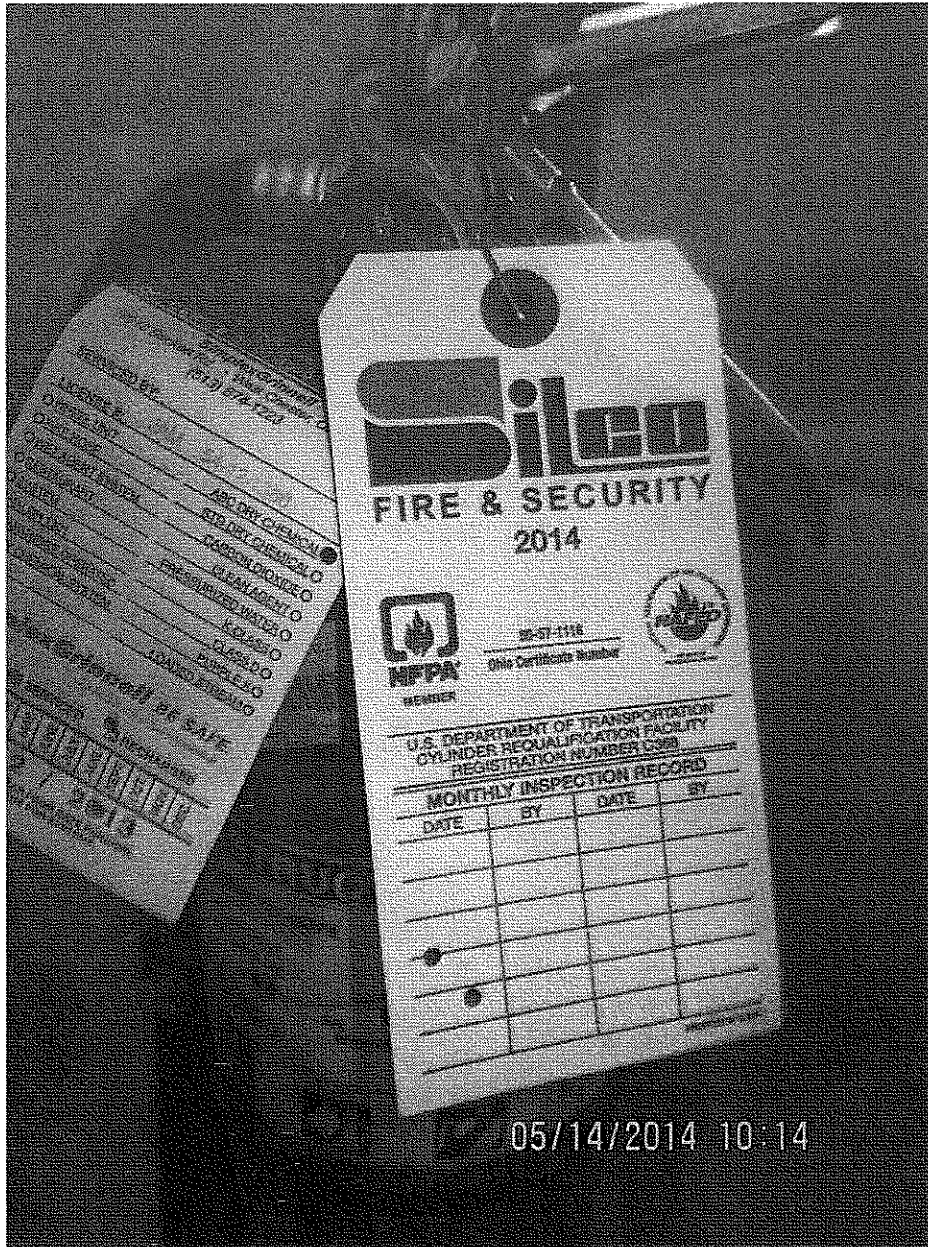
Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 –Emergency Equipment

Attachment A
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Photograph: #25

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 -Emergency Equipment

Attachment A
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Photograph: #26

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 Emergency Spill Equipment

Attachment A
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Photograph: #27

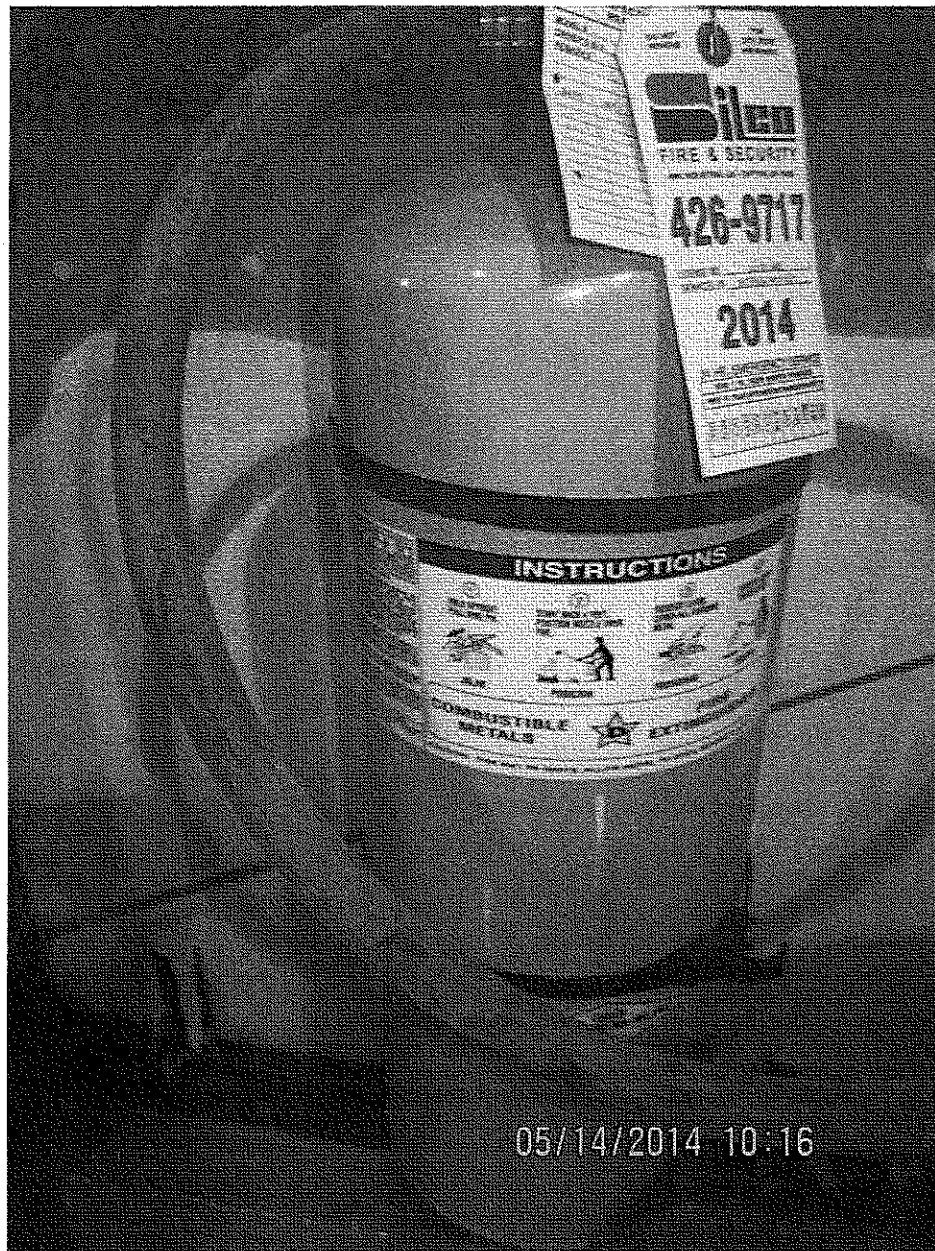
Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 –Emergency Equipment

Attachment A
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Photograph: #28

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH 751 724 312

Description: Area B Building 479 –Emergency Equipment

Attachment A
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Photograph: #29

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 479 –Emergency Equipment

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Photograph: #30

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Area B Building 479 – Storage Methyl Bromide Waste

Attachment A
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Photograph: #31
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 14, 2014
Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312
Description: Area Building 477 –Consolidation at Hazardous Waste Building

Attachment A
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Photograph: #32

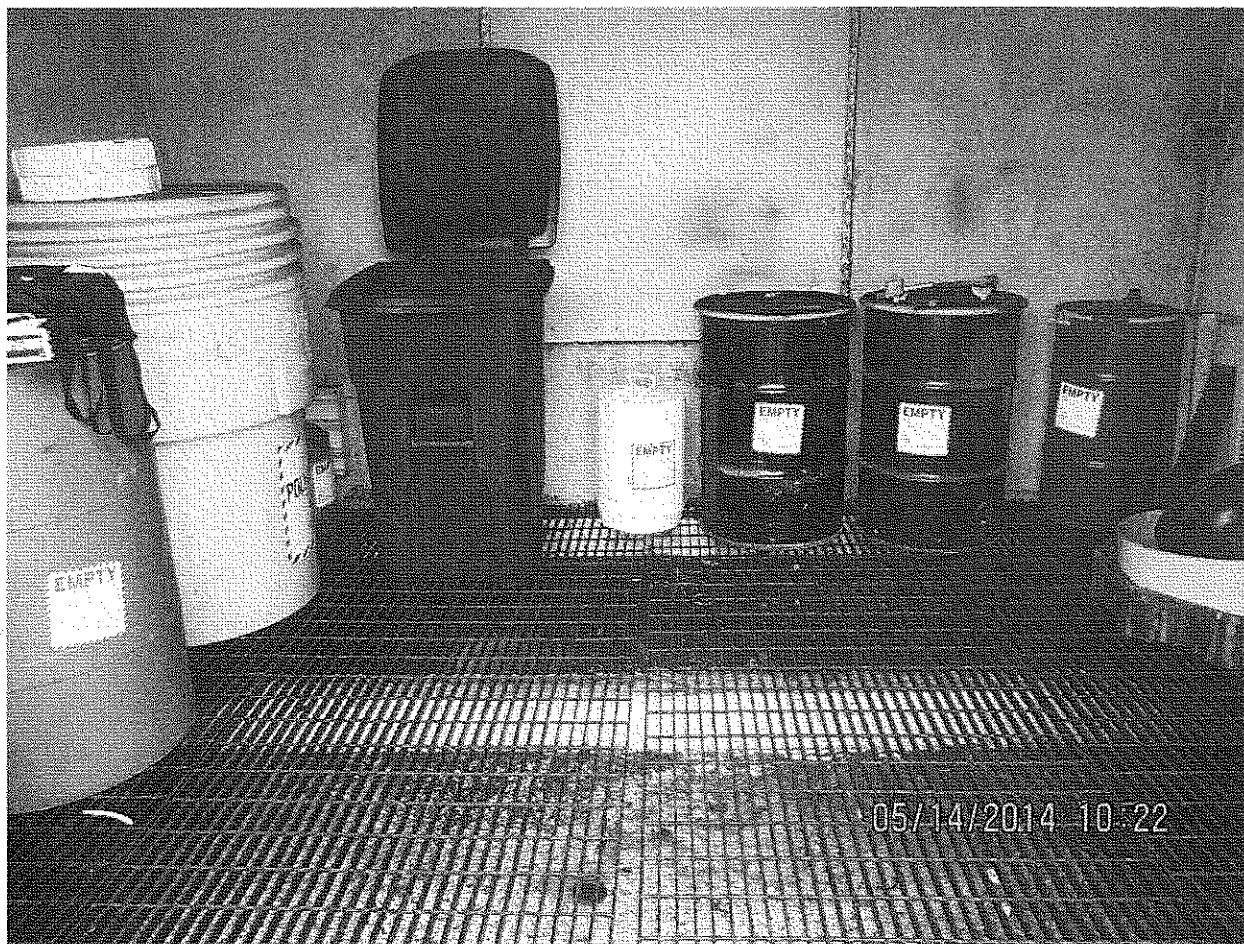
Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Area Building 477 –Consolidation at Hazardous Waste Building

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Photograph: #33

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 477 –Consolidation at Hazardous Waste Building

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Photograph: #34

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Building 475 –Consolidation at Hazardous Waste Building

Attachment A
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Photograph: #35
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 14, 2014
Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312
Description: Building 475 –Universal Waste Storage Building

Attachment A
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Photograph: #36

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Area B building 479 – Universal Waste Storage

Attachment A
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Photograph: #37

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Area B Building 475 –Universal waste storage

Attachment A
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Photograph: #38

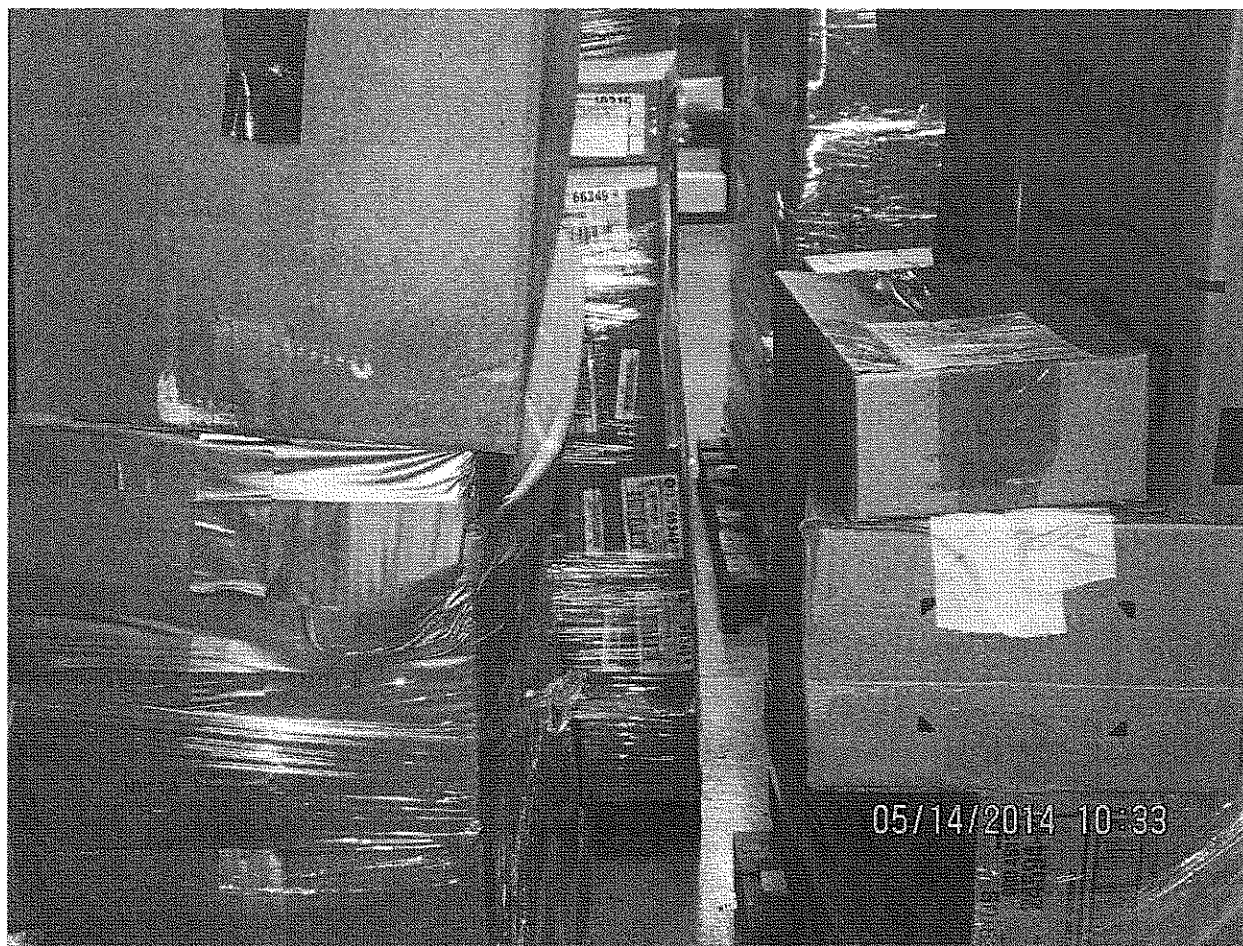
Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Area B Building 475 –Universal waste storage

Attachment A
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Photograph: #39

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 14, 2014

Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312

Description: Area B Building 475 –Universal waste storage

Attachment A
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Photograph: #40
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 14, 2014
Site Location: 2750 ABW-EM, Wright Patterson AFB, OH7 571 724 312
Description: Area B Building 485 –Container storage Area